

REMARKS

Claims 1-27 are pending in the Application. No new matter has been added. Entry of the amendment is respectfully requested. Reconsideration is respectfully requested.

Priority

The Specification has been amended to claim the benefits of earlier applications. Apparently the Applicants' previous priority amendment request (on pages 4-5 of the originally filed transmittal papers) was not entered by the Office.

Applicants request acknowledgment of their claims for priority.

Information Disclosure Statement

Applicants request acknowledgment of their IDS filed December 22, 2000.

The Rejections

Claims 1, 10-14, and 26-27 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Ahlin (U.S. 6,219,587).

Claims 2, 9, and 15-23 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Ahlin in view of Liff (U.S. 5,797,515).

Claims 3-8 and 24-25 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Ahlin in view of Liff and Official Notice.

These rejections are respectfully traversed.

Ahlin Does Not Constitute Prior Art

For purposes of U.S.C. § 103(a) the Ahlin reference has a filing date of May 27, 1998. However, the present invention is entitled to (and claims the benefit of) the priority date of earlier applications. Thus, the Ahlin reference cannot constitute prior art pursuant to 35 U.S.C. § 103(a).

For example, the present invention is entitled to at least the December 16, 1994 filing date of U.S. Application No. 08/361,783 (U.S. Patent No. 5,790,409). U.S. Patent No. 5,790,409 supports steps (a)-(e) recited in claim 1. For example, note step (a) support at col. 3, lines 20-37, col. 9, lines 1-33, and col. 16, lines 46-63; step (b) support at col. 10, lines 56-67; step (c) support at col. 8, lines 59-67; step (d) support at col. 18, lines 20-22; and step (e) support at col. 20, lines 17-29.

For reasons of brevity the Applicants have not necessarily presented all of the supporting basis in all of the earlier applications to which Applicants are entitled priority, including U.S. Patent No. 5,790,409. Applicants reserve the right to later present additional reasons. Nevertheless, the Applicants have shown that the Ahlin reference does not constitute prior art.

Furthermore, Applicants "may overcome a 35 U.S.C. § 103 rejection based on a combination of references by showing completion of the invention by applicant prior to the effective date of any of the references" (MPEP § 715.02). Therefore, any rejection involving the Ahlin reference is invalid. Since all of the 35 U.S.C. § 103(a) rejections involve Ahlin, they are all moot. Therefore, it is respectfully submitted that the 35 U.S.C. § 103(a) rejections should be withdrawn.

Liff Does Not Constitute Prior Art

For purposes of 35 U.S.C. § 103(a) the Liff reference has a filing date of May 3, 1996 and claims priority as a continuation-in-part of U.S. Patent No. 5,713,485 filed October 18, 1995. However, as previously discussed, the present invention is entitled to earlier priority, including at least the December 16, 1994 filing date of U.S. Patent No. 5,790,409. Thus, the Liff reference also cannot constitute prior art pursuant to 35 U.S.C. § 103(a).

Conclusion

Applicants respectfully submit that no prior art has been applied that discloses or suggests recited features and relationships. Nor has any prior art been applied that has a teaching, suggestion, or motivation for combining features of prior art so as to produce Applicants' invention. Thus, allowance of all of Applicants' pending claims is respectfully requested.

The undersigned will be happy to discuss any aspect of the Application by telephone at the Examiner's convenience.

Respectfully submitted,



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